

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TRUSTEES OF THE SUBURBAN TEAMSTERS	)	
OF NORTHERN ILLINOIS WELFARE AND	)	
PENSION FUNDS,	)	
	)	
Plaintiffs,	)	
	)	No. 08 C 5376
v.	)	
	)	Judge Darrah
DEMPSEY ING, INCORPORATED,	)	
an Illinois corporation	)	Magistrate Judge Brown
	)	
Defendant.	)	

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for entry of a default judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

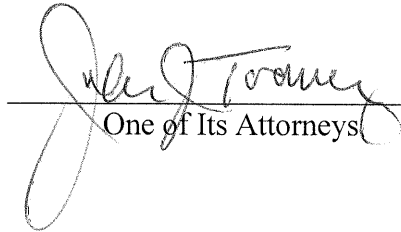
1. Suit was filed on September 19, 2008 for collection of delinquent contributions, attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Service upon DEMPSEY ING INCORPORATED, an Illinois corporation was made on the Defendant on October 13, 2008, and a copy of the proof of service was filed with the court on October 27, 2008
3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$12,601.06	Welfare
\$12,501.06	Pension
\$925.00	Attorneys fees
<u>\$450.00</u>	Court costs
\$26,477.12	

WHEREFORE, Plaintiff prays for the entry of judgment against Defendant,  
DEMPSEY INC INCORPORATED,, an Illinois corporation, and in favor of Plaintiffs,  
TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS  
WELFARE AND PENSION FUNDS in the amount of \$26,477.12.

TRUSTEES OF THE SUBURBAN TEAMSTERS  
OF NORTHERN ILLINOIS WELFARE AND  
PENSION FUNDS

By:

  
One of Its Attorneys

JOHN J. TOOMEY  
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